

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)
)
Application by SBC Communications Inc.,)
Southwestern Bell Telephone Company,) CC Docket No. 00-65
And Southwestern Bell Communications)
Services, Inc. d/b/a Southwestern Bell Long)
Distance for Provision of In-Region)
InterLATA Services in Texas)

SUPPLEMENTAL REPLY AFFIDAVIT OF ELIZABETH A. HAM

STATE OF MISSOURI)
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) STATE OF MISSOURI)
)
COUNTY OF ST. LOUIS) LOUIS)

**TABLE OF CONTENTS
OSS SUPPLEMENTAL REPLY AFFIDAVIT**

SUBJECT	PARAGRAPH
PROFESSIONAL EXPERIENCE AND EDUCATION BACKGROUND	1
EXECUTIVE SUMMARY	2
DOCUMENTATION	7
INTEGRATION AND PARSING	17
Integration and Parsing of EDI and CORBA vs. DataGate	18
Scope of "Parsing of CSR Function" after May 27, 2000 EDI Release	23
CLEC Evidence of Integration	26
Telcordia and TPUC Evidence of Ability to Integrate	32
Integration Comparison with Bell Atlantic	39
AT&T	41
MCI WorldCom	50
REJECTS AND UP-FRONT EDITS	58
CLECs' SYSTEM COMPLAINTS	79
Elimination of Address Requirement for Conversions	80
UNE-P	88
System Availability	90
EDI Capacity and Scalability	92
LEX Flow Through	100

OSS Performance Measures	103
Miscellaneous Issues	106
CHANGE MANAGEMENT	
CMP Compliance	111
Versioning	121
Test Environment	126
CONCLUSION	133

ATTACHMENTS	
CLEC00-102 (05-04-00)	A
Pre-Order Diagram	B
DataGate CSR and Address Validation Address Information Example	C-1
CLEC00-092 (06-25-99)	C-2
CLEC Reject Rates (Proprietary)	D
Address Examples (Proprietary)	E
Ex Parte Letter (05-03-00)	F
McFarland Affidavit (Proprietary)	G
VFO Information	H
CLEC00-080 (5-19-00)	I-1
CLEC00-081 (5-19-00)	I-2
Telcordia's "Pre-order/Order Integration Analysis Report"	J
Miller/Jordon Declaration, ¶ 20	K
Miller/Jordon Declaration, ¶ 20	K
CLEC00-078 (05-16-00)	L
CLEC00-034, -036, -049	M
TPUC Workshop Transcript, 4-17-00	N
TPUC Open Meeting Transcript, 12-21-98	O
LSOR, (End User; Form Field 13; SASN) (Proprietary)	P
Total Service Order Flow Through	Q
CLEC00-057 (04-06-00)	R
Crafton/Connolly Affidavit, ¶¶ 231, 233	S
Crafton/Connolly Affidavit, ¶¶ 231, 233	S

I, Elizabeth A. Ham being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

1. My name is Elizabeth A. Ham. I am the same Elizabeth Ham who filed direct and reply affidavits in CC Docket No. 00-4. I also filed a supplemental affidavit in this proceeding. I am Vice President-Long Distance Compliance for SBC Communications, Inc. ("SBC").

PURPOSE AND EXECUTIVE SUMMARY

2. On April 11, 1997 SWBT submitted its 271 Application for Oklahoma to the FCC. My affidavit in support of that ~~application demonstrated~~ application, demonstrates SWBT's compliance with the requirements of the Act for the provision of nondiscriminatory access to OSS.
3. Both before and since that time SWBT's OSS have been examined and scrutinized to a truly extraordinary degree. For almost two years SWBT's OSS and the access ~~SWBT~~ it provides to those OSS was one of the focal points of the Texas collaborative process. Every aspect of SWBT's systems and processes was open to inspection and questioning by the CLECs and by the TPUC. SWBT's OSS subject matter experts ("SMEs") attended countless collaborative process work sessions, conference calls, and TPUC Open Meetings to explain SWBT's OSS functionality and how that functionality is made available to CLECs on a non-discriminatory basis. SWBT's OSS were the subject of comprehensive ~~testing that~~ testing, which was supervised by the TPUC, ~~was~~ open to participation by all interested CLECs, and the results of which were validated by an independent third party.

4. As a result of this process, SWBT has made numerous improvements to its OSS interfaces and support systems designed to enhance both the performance of its systems and the CLECs' access to those systems. These improvements include:
- advanced flow-through capabilities (well beyond those available in BANY or any other region);
 - addition of LASR/MOG editing capabilities (at the specific request of the CLECs)
 - real time processing of FOCs, SOC, and rejects;
 - direct access to SORD – to SWBT's knowledge, SWBT is the only ILEC currently providing access to its proprietary OSS retail systems, including SORD and ~~EASE~~ EASE;
 - creation of a Change Management Process, including CLEC ability to set agenda for meetings, submit change requests, ~~and~~ halt releases ~~with~~ through the go/no-go vote option;
 - creation of a sole CLEC joint test environment;
 - creation of the OSS CLEC Support group (to support CLECs implementing and utilizing SWBT's OSS);
 - improved and more comprehensive documentation, including complete business rules for ordering and pre-ordering (LSOR and LSPOR).
5. SWBT's development of these capabilities, as well as the overall capabilities of its OSS, are detailed in the TPUC record on file before the FCC in this proceeding. My initial affidavit, together with my reply affidavit, my supplemental affidavit and this supplemental reply affidavit document the nature and extent of ~~SWBT's~~ SWBT's OSS offerings in detail. These affidavits have responded to the complaints and criticisms of the CLECs by demonstrating in all cases that SWBT is providing nondiscriminatory access to state-of-the-art systems that are operationally ready to handle, and are in fact handling, commercial volumes of pre-ordering, ordering, provisioning, maintenance and repair, and billing transactions.
6. CLECs have failed to present any credible evidence to counter the overwhelming record demonstrating that SWBT's OSS provide parity access or (where there is no retail analog) a meaningful opportunity to compete. The issues presented by CLECs and

addressed below (often for the second, third, or fourth time) have been reviewed by the Texas Commission, considered by Telcordia and, in every instance – despite the concerted efforts of relatively few CLECs – SWBT’s OSS have been found to meet the requirements of the Act. At most, the CLECs establish that there is more that can be done before SWBT’s systems can be considered perfect. That will always be the case, although SWBT is in fact implementing, on an ongoing basis, many of the improvements suggested by CLECs. The critical point is that SWBT’s systems, as they stood at the time of SWBT’s supplemental application on April 5, verifiably provide all CLECs nondiscriminatory access to pre-ordering, ordering, provisioning, maintenance and repair, and billing functions.

DOCUMENTATION

7. AT&T alleges that SWBT has failed “to publish adequate documentation.” Chambers/DeYoung Supp. Decl. ¶¶ 36-42. The facts on record with regard to this issue prove otherwise.
8. Based on its independent review, Telcordia concluded that SWBT furnishes CLECs with readily available, clear and comprehensive information resources that conform to applicable Ordering and Billing Forum (“OBF”) and TCIF EDI guidelines with respect to mapping. EDI Documentation Report at ES-1, (provided as Attachment T to my initial affidavit). Four independent CLECs interviewed by Telcordia found the information resources provided by SWBT, in particular the “Mapping Matrix”¹ and SWBT’s Local

¹ The “Mapping Matrix” for service orders was developed and maintained by the Service Order Subcommittee and is available from its web page. The Mapping Matrix shows every OBF field and how that field is passed in EDI. The Mapping Matrix is an industry document, therefore not unique to SWBT, although SWBT follows the guidelines as closely as possible.

Service Ordering Requirements (“LSOR”) to be useful. Id. at 11. Various independent CLECs have been able to establish connectivity with SWBT’s EDI Ordering Gateway, moving from process initiation to limited production within a few months time using the same SWBT documentation and resources available to AT&T. Ham Aff. ¶ 111. More recently, other CLECs have successfully migrated from LEX to EDI ordering in the same time or less. In the face of this record, AT&T fails to present any credible evidence in support of its own purported difficulty with the identical documentation used by a variety of other CLECs to implement EDI.

9. In an effort to make its already comprehensive documentation more user-friendly, SBC initiated a documentation meeting with CLECs on April 11, 2000. The items covered in that meeting, together with SWBT’s responses, were circulated to all CLECs via Accessible Letter, CLEC00-102, dated May 4, 2000 (provided as Attachment A). As set out in that letter, SBC will move to common LSOR and ~~LPSOR~~Local Services Pre-Order Requirements (“LPSOR”) documents for its 13-state region with the introduction of the common platform for ordering and pre-ordering. The LSOR and LSPOR for the first quarter 2001 will contain the following EDI information for each LSOR/LSPOR field:

- Header, detail or sub line
- Transaction set position
- EDI data element
- EDI field name

10. In addition, SBC will provide a mapping document on its CLEC website that will provide the requested cross-reference between the LSOR and the CLEC Handbook for SWBT. This will be a separate document available for the December 2, 2000 EDI/LASR release for SWBT. It will not be provided in the LSOR due to the fact that the CLEC Handbook is updated frequently, and whereas the LSOR is updated with each new EDI/LASR

release. Consequently, the cross-reference information would be outdated in the LSOR, once the CLEC Handbook was updated.

11. Other indicated changes to SWBT's documentation in response to CLEC's suggestions include:

- SBC will provide customized SEF files for all regions (by transaction type) on its CLEC website in the 4th Quarter 2000.
- SBC will provide Universal Service Order Code ("USOC") list by product/state by the end of August 2000.
- SBC will provide the LSOR and LSPOR in either a Word document or in PDF format. If the CLECs decide as a community to have the LSOR/LSPOR in Word only, the documents will be available in Word for the December 2000 release.
- The individual pages of the LSOR/LSPOR will include the LSOG and EDI version reference on each page beginning in the 4th Quarter 2000.
- The CLEC website is currently being re-designed to provide a more robust search capability. The new website will be available in July 2000.
- Additional changes are listed in the Accessible Letter.

12. On ~~On~~ During a May 9, 2000 conference call, SWBT's proposals as set out above and in Attachment A were accepted unanimously by the ~~attending~~participating CLECs. The only item outstanding is whether to continue to provide the LSOR and LSPOR in PDF format or ~~provide them~~ in Word format. AT&T's representative on the call suggested the documents remain in PDF format because of the unique advantages PDF offers users. However, it was (another) AT&T representative (not attending the conference call) who, along with MCI WorldCom's representative (also not in attendance) had requested the change in format to Word. The format question was tabled while AT&T held internal discussions and MCI WorldCom was contacted. If either (or both) of the original CLECs requesting the change to Word format still wants the documents in Word, this issue will be brought up before the CLEC community to reach a consensus. If AT&T and MCI WorldCom want the LSOR and LSPOR to continue to be provided in PDF format—the documents will remain in PDF format.

13. In light of its participation in the April 11 meeting, it is odd that AT&T does not even reference the meeting in making the complaints that appear at Chambers/DeYoung Supp. Decl. ¶ 42, especially given that the issues raised by AT&T were discussed at length at that meeting. In response to the first issue, SWBT notes that cross-referencing between the LSOR and other documentation can currently be accomplished by use of the “Search” function for the CLEC Handbook. However, as noted above, SWBT has agreed to provide cross-referencing ~~in the LSOR itself~~ via a mapping document on the CLEC website beginning in the first quarter 2001.
14. AT&T’s complaint that SWBT “does not supply a list of those pages that have been changed” when it issues new versions of the LSOR is misleading. AT&T’s Chambers/DeYoung Supp. Decl. ¶ 42. In fact, as discussed at length at the April 11 meeting, SWBT currently issues the LSOR in PDF format. An index is provided of all changes, listed by Form, Section and Field number, together with a sample page showing the Field before and after the change. Thus, changes to the LSOR are readily accessible by the CLECs. Because of its PDF format, different CLEC printers may print the PDF format with different page numbering. Accordingly, so long as the LSOR is maintained in PDF format, providing a list of “changed pages” as requested by AT&T would be more confusing than helpful. It was this very issue that led to the above-referenced discussion of whether the format of the LSOR should be changed from PDF to Word. With Word, changes could be referenced by page number. Given AT&T’s own internal confusion on this issue, SWBT is surprised to find this complaint in AT&T’s comments.
15. Finally, contrary to AT&T’s allegations, the CLEC Handbook is updated as necessary to correspond with SWBT’s releases. Id. SWBT notifies all CLECs of changes and updates

to the CLEC Handbook through updates to the “What’s New” section of the CLEC Website. At the April 11 meeting, AT&T was the only CLEC requesting notification in addition to the notification already provided. The consensus of the other participating CLECs was that such additional notification, via e-mail or otherwise, would be unnecessary and – in terms of creating additional and redundant information – would be more of a hindrance than a help.

16. Substantial evidence on the record clearly establishes that SWBT already provides comprehensive documentation detailing not only EDI implementation but also all aspects of SWBT’s OSS. The sixteen CLECs in production (five “new” CLECs since March 2000) using SWBT’s EDI Ordering Gateway uphold SWBT’s affirmation that its EDI documentation and other resources support nondiscriminatory access for CLECs.

INTEGRATION AND PARSING

17. The evidence on file with the FCC clearly and unequivocally establishes that CLECs are capable of, and have in fact, integrated each of SWBT’s three pre-ordering interfaces (DataGate, EDI and CORBA) with its EDI ordering interface. SWBT also has conclusively demonstrated that CLECs are capable of parsing address information in each of its three pre-ordering interfaces.²

² SWBT’s DataGate is a proprietary pre-ordering interface that SWBT introduced January 5, 1997 in advance of industry EDI standards. Currently SWBT provides address via the Address Validation for DataGate on a partially parsed basis (city, state, zip) and via the CSR transactions. SWBT’s EDI pre-ordering interface was introduced in two releases based on industry standards. The March 28, 1999 release provided for parsed address validation, and the October 17, 1999 release provided CSR transactions, fully parsed with the exception of the address information. SWBT’s CORBA pre-ordering interface was introduced on the same release dates and with the same parsing capabilities as EDI pre-ordering.

Integration and Parsing of EDI and CORBA vs. DataGate

18. SWBT offers CLECs a choice of three pre-ordering interfaces: EDI and CORBA, which are based on industry standard protocols, and DataGate, which is SWBT's proprietary pre-order interface. As EDI and CORBA standards were introduced by the industry forums, they were used to "front-end" DataGate, preserving DataGate's background application functionality, data content, and performance standards. SWBT used this approach because DataGate's performance had already been proven in a production mode by the time the industry developed EDI and CORBA standards. Ham Aff. ¶ 68. This means that CLECs using DataGate for pre-ordering interface directly with DataGate to SWBT's back end systems. It also means that CLECs using EDI or CORBA interface with SWBT's EDI /CORBA Gateway, which then interfaces with DataGate to SWBT's backend systems. Attachment B pictures this very relationship between DataGate and EDI and CORBA.
19. Regardless of the pre-ordering interface used by the CLEC, SWBT makes end user address information available in two ways. The CLEC may obtain address information via the ~~CSR~~Customer Service Record ("CSR") or via the Address Validation function. For all three pre-order interfaces, SWBT provides address information obtained via the CSR in concatenated format. Address information obtained via the Address Validation function is concatenated in DataGate, but parsed for both EDI and CORBA.
20. Because EDI and CORBA use DataGate to provide CSR and Address Validation from SWBT's back end, the very fact that SWBT provides parsed address information in ~~EDI and CORBA~~EDI's and CORBA's Address Validation function demonstrates that DataGate's Address Validation function is capable of being parsed and subsequently

integrated with ordering. Some CLECs have asked why SWBT cannot use the same code used to parse Address Validation in EDI/CORBA to parse address information in DataGate. SWBT parsed the address information in EDI/CORBA in a different programming language than that used by DataGate. Notably, the Address Validation function in a parsed format for EDI/CORBA was made available at the initial deployment of the interfaces by SWBT in March 1999. In order for SWBT to change its method of presenting pre-order information via DataGate at that time (or any time thereafter), SWBT would have been obligated to follow Change Management guidelines, as any change in DataGate's output fields impacts CLECs already in production.

21. Street address information, when returned from SWBT to the CLECs in concatenated format, is identical, regardless of the pre-order interface and regardless of whether the information is returned via a CSR (in EDI or CORBA via DataGate or direct from DataGate) or a DataGate Address Validation inquiry.³ The business rules are the same, regardless of the pre-order interface or the pre-order function performed. In addition, the output fields for concatenated street address from SWBT's three pre-order interfaces and for both pre-order functions (Address Validation and CSR) and the input fields on the LSR are identical. Therefore, it follows that concatenated street address information contained in either pre-order function returned via any of the three pre-order interfaces can be parsed.
22. Notably, as set out in my initial affidavit (Ham Aff. ¶ 182), my reply affidavit (Ham Reply Aff. ¶ 49), and my supplemental affidavit (Ham Supp. Aff. ¶ 17), SWBT is in

³ Attachment C-1 provides an example of address information returned via the Address Validation and CSR functions in DataGate. An example of address information returned via the CSR function of DataGate and EDI/CORBA was provided in Attachment F to my supplemental affidavit. All four examples demonstrate that address information is returned in identical formats.

compliance with ~~Ordering and Billing Forum (“OBF”)~~ OBF standards by providing address information in a Concatenated Address format. The Concatenated Address Information (“CAI”) format is the way the address is stored in SWBT’s back end systems and is in parity with the way SWBT provides address information to its retail operations. Id. Further, SWBT’s intent to provide the address information in concatenated format, as conveyed to the CLECs in accessible letters, was met without objection by the CLECs as demonstrated by questions raised at the pre-ordering workshop held May 25, 1999 (*See* Attachment C-2, CLECSS99-092, dated June 25, 1999).

Scope of “Parsing of CSR Function” After May 27, 2000 EDI/LASR Release

23. As detailed in my supplemental affidavit (¶¶ 24-32), CLECs have been notified that they will no longer be required to populate the End User Service Address on the LSR for Conversion (~~Activity “V”~~) Activity (“V”) LSRs. Changes will be made to LASR to remove edits that require fields to be populated when the ~~Activity~~ activity and all associated ~~Line Activity is Conversion Activity~~ line activity is conversion activity with the exception of xDSL loops. The End User Service Address field will continue to be required on new activity. One of the benefits of the address elimination requirement is it will render it unnecessary for any CLEC to utilize parsed address information on the LSR for conversion activity.
24. Some CLECs have suggested that SWBT implement parsed CSRs in EDI/CORBA earlier than the scheduled June 2001 date. However, once the May release enhancement is applied, there will be no situation (following SWBT’s recommended procedures) for

which a CLEC will be required to obtain a customer's address from the CSR for the purposes of populating a LSR.

- An address will no longer be required on a conversion after May 27.
- An address is not required for feature changes.
- An address is never required to create a trouble ticket.
- An address is required on all "new" connects, but in the case of new connects, there is no CSR available, and the address will be obtained from Address Validation.
- On xDSL an address is required, but currently orders for xDSL must be submitted as "new" connects, therefore address should be obtained via Address Validation.
- On all xDSL requests where the CLECs performs a "Loop Qual," address validation is required prior to Loop Qual.
- A CLEC can choose to submit an xDSL request *without* performing a Loop Qual and further choose to use the address from the CSR for its own reasons—but this is not the recommended practice.

25. DSL requests after May 27, 1999 may be one of the few situations wherein a CLEC will use the CSR for a customer's service address, however, DSL service requests accounted for just .13% of SWBT's EDI volume in April 2000.

CLEC Evidence of Integration

26. SWBT's evidence of CLEC integration and parsing capability includes the following:

27. Further substantiation of SWBT's claim that pre-order and order interfaces are fully capable of integration is evidenced by Attachment F. Attachment F is an ex parte letter filed with the FCC on May 3, 2000 from Mantiss verifying that Mantiss has established electronic connectivity to Southwestern Bell on behalf of a major nationwide CLEC. Mantiss corroborates that the CLEC is able to use pre-ordering information obtained in the Address Validation function of CORBA, which is then integrated with SWBT's EDI Ordering Gateway, to allow for the streamlined submission of Local Service Requests ("LSRs").
28. It is surprising and disappointing that Sprint maintains that SWBT's "representation" that CLECs have integrated EDI/CORBA with EDI ordering "is not supported by any statements from the CLECs themselves or any other information that would make an independent assessment possible." Sprint Comments p. 45, footnote 51. In fact, _

29. ***

*** The VFO

explanation on the Telcordia/GEIS website (www.exchangelink.net) describes VFO as a user friendly GUI coupled with flexible architecture that enables CLECs to seamlessly create and manage multiple types of service requests and pre-order inquiries to deliver a full range of services.⁴ Information from the Telcordia/GEIS website has been provided as Attachment H to my affidavit. A user of VFO within Exchange Link can activate a key to command the system to populate end user information such as street address from the pre-order screen to the order form.

30. Notably, ~~GXS~~ General Electric Global eXchange Systems ("GXS") (the consulting arm of GEIS, one of the developers of VFO and Exchange Link) is also the company that SWBT hired to assist CLECs in integrating pre-order and order. It is obvious that GXS is knowledgeable about developing an integrated pre-ordering and ordering solution, because they have live customers using Exchange Link and VFO. GXS is familiar with SWBT's systems and ordering rules because they have developed an integrated solution for a CLEC in SWBT's region and are in the process of implementing VFO and Exchange Link for a second CLEC.⁵ GXS has the experience and know-how to evaluate

⁴ Integration of all service types except UNE-P are offered by VFO, and UNE-P is scheduled to be tested in June 2000. However, the address field on the LSR is identical whether the service request is for Resale, UNE Loop or UNE-P, so if VFO can integrate the address information for UNE Loop, it will be able to integrate address information for ~~UNE-P~~ UNE-P as well.

⁵ ***

a CLEC's technological platform and strategy and provide the CLEC with recommendations to insure successful integration.

31. SWBT has provided adequate documentation for the CLECs mentioned above or their vendors to parse concatenated fields and integrate SWBT's three pre-ordering interfaces with its EDI ordering gateway. Various documentation was listed and provided in my supplemental affidavit. Ham Supp. Aff. ¶¶ 8-9 and Attachments C-1 and C-2. In addition, SWBT has issued an Accessible Letter, CLECSS00-080, dated May 19, 2000 (Attachment I-1), which notifies the CLECs that, as of June 2, a new section will be added

31. to the CLEC Online web site. This section will contain:

- Links to Industry Guideline web sites for EDI and CORBA,
- Links to the LSOR and LSPOR,
- Links to the SWBT Universal Service Order Practice ("USOP") web site
- Copies of the Integration Workshop Handouts (will be available after June 21, 2000),
- Business rules for parsing the address response on the Address Validation and CSR functions for EDI, CORBA and DataGate.

Telcordia and TPUC Evidence of Ability to Integrate

32. In addition to the foregoing evidence, at the direction of the ~~Texas Public Utility Commission ("TPUC")~~ TPUC, Telcordia conducted a review of SWBT's documentation and other information available to CLECs regarding integration of pre-order and order for all three of SWBT's pre-order interfaces (since the business rules are applicable to all three of SWBT's pre-order interfaces). See, TPUC Supp. Evaluation at 5. In its *Pre-*

order/Order Integration Analysis Report (“Integration Analysis Report”),⁶ Telcordia verified that SWBT provides or references sufficient documentation and information to enable a CLEC to use its backend systems to integrate pre-order and order. Telcordia bases its determination on the fact that it was able, using only SWBT documentation, SWBT-referenced documentation, and information obtained from SWBT pre-order representatives, to query and store pre-order information from SWBT and use that information in the SWBT ordering process. Integration Analysis Report at 8. Telcordia utilized pre-order information from the Customer Service Inquiry (“CSI”)⁷ function in EDI pre-order. The address parsing function is the same for CSR and Address Validation functions via all three pre-order interfaces (DataGate, EDI and CORBA).

33. As described below, Telcordia parsed the address information in the CSR query via EDI (address fields are the only fields on a CSR that are not returned to CLECs in a parsed format via EDI and CORBA). As demonstrated by Attachment F in my supplemental affidavit, the street address field returned via EDI is identical to the street address field returned via DataGate. In fact, EDI receives its CSR information from CRIS directly through DataGate without format changes. Thus, by validating that the address information returned via the EDI pre-order transaction for CSR was able to be parsed (and subsequently integrated), Telcordia implicitly validated that the pre-order transaction for CSR in DataGate was able to be parsed and integrated.⁸
34. Telcordia reported that the parsing of the response script, with the exception of the CAI

⁶ Telcordia’s Supplemental OSS Readiness Report Pre-order/Order Integration Analysis Report, Investigation of Southwestern Bell Telephone (SWBT) Company’s Entry into the Texas interLocal Area Transport (interLATA) Telecommunications Market, Project No. 20000 (TPUC filed April 2000) is provided as Attachment J to this affidavit.

⁷ “CSI” in EDI/CORBA is the same function and provides the same information as the “CSR” function in DataGate and uses the same business rules.

segments did not present any problems. Id. at 6. Telcordia referred to the ~~Universal Service Order Practice (“USOP”)~~USOP manual, the ~~Local Service Pre-Order Requirements (“LSPOR”)~~LSPOR and TCIF Guidelines.⁹ Because Telcordia had additional questions about the explanations of the CAI segments, Telcordia called the SWBT/CLEC pre-order organization representative to discuss and gain a better understanding of the CAI segments in the documentation. All questions were answered to Telcordia’s satisfaction and following this call, Telcordia completed the script to parse the CSI response. Id. at 7.

35. To test its parsing script, Telcordia took the following steps:

- All values of the pre-ordering response were captured and stored in the order system.
- CAI fields were populated with varying amounts of values and retested to assure that CAI data could be captured correctly under all response scenarios.
- Populate the LSR with the stored information in the order system.
- Script was added to the LSR to identify the required values stored & to populate the corresponding fields with values in the ordersystem ~~in the order system~~.
- When the CLEC order system was queried, the identified fields were populated with the information returned from the pre-order response. Id. at 7.

36. As a result of its experience, Telcordia recommended three changes to SWBT’s documentation ~~in order that~~ to allow CLECs ~~can~~ more easily to integrate pre-order and order:

- In SWBT’s pre-order documentation, indicate the differences between TCIF and SWBT pre-order responses as they pertain to loops. Although SWBT’s Test Data Document appears to address ~~this, in this issue,~~ the document shows the output in “English” rather than “EDI”, “EDI,” which diminishes its effectiveness.
- Include a sample of an SWBT response in the pre-order documents.
- Include different CAI scenarios in the samples. Id. at 8.

⁸ CLECs have already confirmed that the address information returned via the DataGate CSR can successfully be parsed and integrated.

⁹ The 50-page USOP Table of Contents was attached to my supplemental affidavit as Attachment C-2 (Proprietary). The industry documentation was provided on a CD-ROM as Attachment C-1 to my supplemental affidavit. The LSPOR was provided in my initial affidavit as ~~part of~~ Attachment F (Proprietary).

SWBT implemented the recommended documentation changes and notified CLECs via Accessible Letter CLEC00-081 (provided as Attachment I-2), dated May 19, 2000 that SWBT is updating its documentation to reflect these additions.

37. Based upon Telcordia's review, the TPUC concluded that SWBT provides nondiscriminatory access to its OSS, including the integration of pre-order and order. TPUC Supp. Evaluation at 5. The TPUC cites two additional resources SWBT has made available to CLECs in their efforts to perform integration: 1) The agreement between SWBT and General Electric Global Exchange Systems ("GXS")¹⁰ GXS¹¹ to provide assistance to CLECs at SWBT's expense, and 2) SWBT- sponsored workshops, beginning June 21, 2000, to assist CLECs with integration issues. *See* Id. at 6; *see* Ham Supp. Aff. ¶¶ 15, 16.
38. As set out above (footnote 2), SWBT already provides parsed address information in its Address Validation function via EDI/CORBA pre-ordering. CLECs or their vendors are able to parse ~~Customer Service Record ("CSR")~~ CSR address information or address validation information in DataGate using SWBT's documentation, as evidenced by Sage and Navigator. *See* Ham Supp. Aff., Attachments A and B. And, as mentioned above, Telcordia was able to write a parsing routine to parse the address information obtained from the CSI function of EDI pre-ordering.¹² In addition, the TPUC commented that "Although other carriers have not stepped forward to admit successful integration, the reject rates and order volumes (~~discussed~~ discussed in the "Reject and Up Front Edits" section, ~~below~~ below) provide evidence that has allowed the Texas Commission to

¹⁰ GXS qualifications to offer the consulting service are set out above in ¶ 30.

¹¹ GXS's qualifications to offer the consulting service are set out above in ¶ 30.

conclude other carriers have achieved successful integration.” TPUC Supp. Evaluation at 6.

Integration Comparison with Bell Atlantic

39. As detailed above, the evidence presented by SWBT meets or exceeds the evidence of its ~~filing~~, Bell Atlantic presented in its filing. Bell Atlantic had *one* pre-ordering system (EDI pre-order) that was commercially available for CLEC use. Miller/Jordan Decl. ¶ 20 (Attachment K)¹³. SWBT offers *three* pre-ordering interfaces, all of which currently have ~~pre-~~ pre-ordering functions integrated with EDI for ordering. Bell Atlantic had *one* CLEC file an affidavit that it had developed its own integrated EDI pre-ordering and ordering system (~~Id.~~ Miller Jordan Decl. ¶ 22) and a *second* CLEC mentioned in an ex parte letter that it had successfully integrated EDI. New York Order ¶ 139, footnote 416.¹⁴ Order, 15 FCC Rcd 3953, 4021, ¶ 139 & n.416. By way of contrast, *two* CLECs and *one* vendor have written ex partes to the FCC to confirm that they have developed an integrated pre-ordering and ordering systems using SWBT’s documentation. ***

*** KPMG testified on behalf

of Bell Atlantic that Bell Atlantic’s EDI pre-ordering and ordering interfaces were capable of being integrated. Id. In turn, Telcordia validated that SWBT’s EDI pre-

¹² Business rules are the same, whether the interface is CORBA or DataGate or EDI for both the address in the CSR function and the address in the Address Validation function, as explained in ¶ 20.

¹³ Joint Declaration of Stuart Miller and Marion C. Jordan, ¶ 20, Application by New York Telephone Company (d/b/a Bell Atlantic – New York), Bell Atlantic Communications, Inc., NYNEX Long Distance, and Bell Atlantic Global Networks, for Provision of In-Region, InterLATA Services in New York, CC Docket 99-295 (FCC filed Sept. 29, 1999).

¹⁴ Memorandum Opinion and Order, Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region InterLATA Service in the State of New York, 15 FCC Rcd. 3593, 4021 ¶ 139, n.416(1999)(“New York Order”)

ordering interface and ordering interfaces were capable of being integrated. Integration Analysis Report at 8. The New York Commission confirmed the “integratability” of Bell Atlantic’s pre-ordering and ordering interfaces. Evaluation of the New York Public Service Commission Comments at 48.¹⁵ Based on its review, the TPUC also has confirmed that SWBT’s pre-ordering and ordering interfaces are capable of integration. TPUC Supp. Evaluation at 7. In addition to the foregoing, SWBT offers a consulting engagement with GXS to provide assistance to CLECs at SWBT’s expense and SWBT is sponsoring a ~~workshop~~ workshops to assist CLECs with integration. Ham Supp. Aff. ¶¶ 15-16. As such, the record demonstrates that the integration provided by SWBT’s pre-ordering and ordering interfaces provides an efficient competitor a meaningful opportunity to compete as required by the New York Order.

40. Despite this record, AT&T and MCI WorldCom continue to complain of a purported inability to implement integration and parsing functionalities. SWBT’s reply to these specific complaints follows.

AT&T

41. AT&T alleges that SWBT’s willingness to make available the services of GXS (mentioned above in ¶ 37) is an admission that integration cannot be accomplished without help. Chambers/DeYoung Supp. Decl. ¶¶ 52, 53. This is simply untrue. As discussed above and in my prior affidavits, several CLECs and/or vendors have successfully integrated SWBT’s pre-ordering and ordering interfaces using SWBT’s documentation. As set out in my supplemental affidavit, ¶ 15, SWBT has offered the

¹⁵ Evaluation of the New York Public Service Commission, Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region InterLATA Service in the State

consulting assistance of GXS to CLECs to assist those CLECs in determining which SWBT interfaces and method of integration will best suit ~~the CLEC's~~their business needs.

42. AT&T implicitly admits the value of the GXS offer by mentioning it contacted its Account Manager requesting that SWBT arrange for GXS to provide the promised consulting services to AT&T. Chambers/DeYoung Supp. Decl. ¶ 77. Upon finalizing the contract with GXS, instructions for scheduling GXS's consulting services are set out in CLECSS00-078, dated May 16, 2000, which was distributed to all the CLECs and posted on the CLEC Website (and is provided as Attachment L). CLECs will be contacting GXS directly to arrange consulting sessions and the GXS contact's name, number and email address is published in the accessible letter.
43. While AT&T is certainly welcome to GXS's assistance in this regard, SWBT is surprised that a CLEC with AT&T's advanced capabilities would require such assistance. Similarly, if AT&T is encountering problems in "attempting" to integrate, SWBT would have expected those issues to have been brought to its attention. Despite AT&T's attempts to make it appear as though integration has been a long standing issue on its agenda, the OSS record before the TPUC contains no indication that any CLEC considered integration a necessary prerequisite to market entry in Texas prior to issuance of the BANY order.
44. Although AT&T repeatedly alleges that SWBT *requires* CLECs to perform address validation (Chambers/DeYoung Supp. Decl. ¶¶ 54, 55, 58), the record is devoid of any evidence supporting its claim. AT&T cannot point to ~~one~~any cite in the Verigate or DataGate User Guide,~~not one cite in EDI/CORBA pre-order documentation, not one cite~~

in the CLEC Handbook, ~~not one~~ or in any accessible letter wherein SWBT states that it *requires* address validation. AT&T ~~would not be able to offer proof, even if that were its practice, because~~ cannot offer any proof, because, with one exception, SWBT does not require CLECs to perform address validation. The only exception is in the situation where a CLEC desires to perform "Loop Qual" on SWBT's pre-order interfaces after the April 29, 2000 pre-order release. This is the *first* and *only* time that address validation is *required* before a CLEC can request Loop Qual. (See Attachment M (for the Accessible Letters CLECSS00-034, CLECSS00-036 and ~~CLECSS00-~~ CLECSS00-049 that reference this ~~requirement~~ requirement). In fact, SWBT has always maintained that Address Validation is beneficial to CLECs, but nevertheless ~~an option a CLEC, depending upon its business practices, can decide whether or not to utilize.~~ Ham Aff. ¶ 184, optional, to CLECs. Ham Aff. ¶ 184, Ham Supp. Aff. ¶ 21. In fact, Sage chose not to perform Address Validation, as explained in my previous affidavit. Ham Supp. Aff. ¶ 21. As mentioned elsewhere in this affidavit (¶¶ 26, 45), ~~*** 45),***~~

45. In a "last ditch" effort to "prove" its claim that the Address Validation function of DataGate cannot be integrated with EDI ordering, AT&T totally misrepresents the facts in the ex parte statements of Sage and Navigator. Chambers/DeYoung Supp. Decl. ¶ 57. Despite AT&T's claims, the ex parte statements of the two CLECs do *not* state that integration of the address validation function in DataGate caused "some ~~difficulties,~~ difficulties." Sage and Navigator chose *not* to attempt to integrate the additional function. The address validation "problems" the CLECs continue to experience is a reference to the CRIS/PREMIS mismatch problem. Ham Supp. Aff. ¶ 21.

Again, the “problem” associated with parsing an address from the CSR (provided by CRIS) that is not validated by PREMIS will be eliminated for all conversions (except an xDSL conversion) in May 2000 with implementation of the enhancement to eliminate the address requirement. This is the reason why Sage endorsed the elimination of the address requirement with its statement that the May 2000 release enhancement will “alleviate many of the problems with rejects of LSRs due to errors in completing address information.” *Id.* ¶ 22, Attachment A. The fact that these two CLECs chose to integrate the CSR function rather than the address validation function in no way confirms AT&T’s allegation that integration of the address function cannot be accomplished. Quite the contrary, since the business rules are the same, this proves the address can be parsed and integrated for the Address Validation function.

46. As detailed above in ¶ 21, the output fields in DataGate are identical for the address information, whether that address information is returned via a CSR inquiry or an Address Validation inquiry. *See* Attachment C, which provides an example of the address information returned in both inquiries. In both cases the street address information is returned in identical concatenated format. The business rules used to parse this address information, whether from the CSR or the ~~Address Validation~~ Address Validation, are exactly the same – the output fields in DataGate are identical and the same LSR input fields apply, regardless of the pre-order interface or the ~~pre-pre-order~~ function performed. Two CLECs have already demonstrated the ability to parse address information from the CSR in DataGate. The rules or parsing routine these CLECs used to integrate DataGate (using the CSR function) with EDI ordering are the same rules that can be used to integrate these two interfaces (using the Address Validation function).

47. Finally, AT&T claims that it is hindered from switching to an industry-standard pre-order interface (i.e., EDI/CORBA), and is effectively “locked in” to DataGate because of substantial expenditures ~~in development~~ made to develop DataGate and ~~in AT&T’s to~~ “attempt” to integrate it with EDI for ordering. Chambers/DeYoung Decl. ¶ 61, footnote 27. However, AT&T fails to mention that it has already stated in this proceeding that it is in limited production using CORBA in Missouri and has completed testing CORBA in Texas. Dalton/DeYoung Decl. ¶ 98, footnote 82. Development of an industry-standard pre-order interface thus is clearly a viable option for AT&T and other CLECs.
48. Furthermore, in New York, AT&T acknowledged on the record that, although CORBA was not yet available to all CLECs, AT&T could “ramp up commercial volumes using CORBA’s present capabilities,” even though Bell Atlantic did not offer CLLI and NC/NCI codes. New York Order, 15 FCC Rcd at 4017-18, Order ¶ 132, 136. ¶ 132, 4018-19, ¶ 136. However, in this proceeding, AT&T asserts it cannot use CORBA in Texas because CORBA does not provide the CLLI and NC/NCI functions. Chambers/DeYoung Supp. Decl. ¶ 61. ¶ 61, footnote 27. Moreover, although AT&T has repeatedly brought this issue up in the regulatory arena, AT&T has yet to formally request SWBT to add the CLLI and NC/NCI fields via the Change Management Process. Ham Reply Aff. ¶ 54. Nor has AT&T raised the issue of standardizing industry guidelines for these pre-order functions at OBF. Therefore, AT&T’s assertion that the “substantial expenditures” it has made in its “attempt” to integrate DataGate as a reason for not utilizing its production-ready CORBA interface (which already provides parsed Address Validation) is just another example of AT&T’s attempt to obscure the fact that its use of CORBA at this stage in the proceeding is not to its political advantage.

49. Based on AT&T's rejection rate *** and the volume of LSRs it submitted in April, *** it is reasonable to infer that AT&T – protestations to the contrary — has successfully integrated SWBT's pre-ordering and ordering interfaces. ***

_____* See, e.g., TPUC Supp. Evaluation at 6: "Although other carriers have not stepped forward to admit successful integration, the reject rates and order volumes discussed below provide evidence that has allowed the Texas Commission to conclude other carriers have achieved successful integration."

MCI WorldCom

50. MCI WorldCom alleges that SWBT does not provide fully parsed CSRs and that much of the information on its CSRs is concatenated, rather than fielded (parsed) format. McMillon/Sivori/Lichtenberg Supp. Decl. ¶ 14. SWBT confirmed at the April 17, 2000 Texas PUC workshop (which MCI WorldCom attended), that the EDI/CORBA CSR fields are returned in a parsed format, with the exception of the address fields.¹⁶ Notably, the Concatenated Address Information field is the field that Telcordia was able to parse, as documented in its Integration Analysis Report.

¹⁶ See Attachment N, Workshop Transcript from April 17, 2000, before the TPUC, p. 90. Speaker, Ms. Cox, is a SWBT pre-ordering subject matter expert ("SME").

51. MCI WorldCom professes it would be interested to develop ~~to develop~~ a parsing routine (*Id.* ¶ 20), but was unable to obtain access to SWBT's ~~Universal Service Order Practice ("USOP")~~ USOP Manual via the CLEC Website. *Id.* ¶ 22. Instructions to access the USOP Manual as well as the 50-page Table of Contents of the USOP Manual were provided as Attachment C-2 to my supplemental affidavit. Ham Supp. Aff. ¶ 18. (The entire manual consists of four large volumes and was too voluminous to reproduce as an attachment.) Furthermore, SWBT updates the SWBT USOP manual regularly. For these reasons, it is more efficient to provide the USOP Manual to CLECs via the Handbook. MCI WorldCom could have re-established access (which MCI WorldCom says was interrupted) via the Website and printed its own copy or perhaps, more efficiently, printed the applicable pages.
52. MCI WorldCom also claims to have found parsing "discrepancies." (*See generally*, McMillon/Sivori/Lichtenberg Supp. Decl.) MCI WorldCom previously alluded to discrepancies in the TPUC meeting on April 17.¹⁷ After MCI WorldCom's admission that it had not yet informed SWBT of these discrepancies, MCI WorldCom sent an email to its account manager, dated April 24, requesting a meeting with SWBT pre-ordering SMEs. However, no detail concerning these "discrepancies" was provided until MCI WorldCom filed its supplemental declaration on April 26. *See* Millon/Sivori/Lichtenberg Supp. Decl. ¶¶ 15, 16, 21, 50-54.
53. Subsequent to its supplemental declaration, and at the express request of its Account Manager, MCI WorldCom provided its "discrepancies" to SWBT in advance of MCI

¹⁷ See Attachment N, TPUC Workshop Transcript on April 17, pp. 85-6, Ms. McMillon (MCI WorldCom affiant): "...we are finding discrepancies where in the pre-order documentation, the field lengths will be ten characters, and in the order field, it's eight characters." Ms. Nelson (TPUC Staff): "And then when you do find that inconsistency, do

WorldCom's requested meeting, scheduled for May 18, which was later postponed at MCI WorldCom's initiation to a (yet unnamed future date). Based on SWBT's initial review of the alleged discrepancies, excluding the address information fields, most of the "discrepancies" can be easily accommodated.

54. ~~In its comments on the BANY application, AT&T complained~~As this Commission has made clear, complete uniformity between pre-ordering and ordering field names and formats is not required. In the New York proceeding, the Commission rejected AT&T's complaints that the data returned by Bell Atlantic's pre-ordering CORBA(AT&T was testing CORBA with Bell Atlantic prior to its commercial availability) could not be fully integrated with Bell Atlantic's EDI ordering interface. See New York Order ¶ 136. In response, the FCC stated Order, 15 FCC Rcd at 4018-19, ¶ 136. The Commission stated that it was not "persuaded by commenters' claims that full integration is not presently possible because Bell Atlantic's pre-ordering and ordering field names and formats are not entirely uniform." Id., at 4020, ¶ 139 & New York Order ¶ 139. See also, footnote 415-n.415. Moreover, SWBT anticipates that, should any such "discrepancies"any"discrepancies" be discovered by CLECs in SWBT's documentation,the present case, they will be resolved by the CLECs in the same manner that MCI WorldCom indicated it was able to resolve the field incompatibility and inconsistency problems in Bell Atlantic. Id., footnote 416,Id. at 4021, n.416 (referring to an MCI WorldCom Ex Parte letter).
55. In addition, MCI WorldCom claims that SWBT has not attempted to offer evidence that its Due Date Information (Availability) or Telephone Number ("TN") Selection

you contact your account manager and ask: How are we supposed to handle this?" Ms. McMillon: "we"We will, yes."

(Reservation) functions are integratable. McMillon/Sivori/Lichtenberg Supp. Decl. ¶¶ 12-13. In Bell Atlantic, the FCC found that the successful integration of only two pre-ordering functions (CSR and “limited” Address Validation) in a commercial setting is probative evidence that carriers are capable of integrating the remaining pre-ordering functions. New York Order ¶ 138. ~~Further, the FCC did not rely on Bell Atlantic’s unsubstantiated claims that CLECs were even utilizing~~ Order, 15 FCC Rcd at 4020, ¶ 138. ~~Further, the FCC did not rely on Bell Atlantic’s the TN Reservation and Due Date Availability functions in New York. Further, the FCC did not rely on Bell Atlantic’s unsubstantiated claims that CLECs were even utilizing the TN Reservation and Due Date Availability functions in New York.~~ Id. ¶ 134, fn. 386. unsubstantiated claims that CLECs were even utilizing the TN Reservation and Due Date Availability functions in New York. Id. at 4016-17, ¶¶ 133 & 134, n.386. SWBT has already offered evidence that the same two functions in all three pre-order interfaces can be integrated with SWBT’s EDI ordering.

56. The Due Date function in SWBT’s three pre-ordering interfaces returns the date in the same format required by the LSR. Notably, the Due Date Information function is applicable only to UNE-P and Resale. Other service types (e.g. UNE-Loop, Loop with NP, etc.) use standard due date intervals, thus due date availability is not necessary. In addition, the TN Selection function is already parsed and has already been integrated by at least one vendor for a CLEC in SWBT’s region.

57. Finally, at the April 17, 2000 TPUC work session, MCI WorldCom did not contest SWBT's statement that MCI WorldCom is working with a vendor to provide the integration of MCI WorldCom's side of SWBT's pre-ordering and ordering interfaces.¹⁸

REJECTS AND UP-FRONT EDITS

58. SWBT's reject rates have generally decreased as volume has increased over the past four months – including the rates for manual rejects. (See, ¶¶ 59-61, below). Further, CLECs placing the highest volume of orders have been able to achieve reject rates well below average CLEC reject rates. Ham Aff. ¶¶ 127-129, Ham Supp. Aff. ¶¶ 34, 38.
59. SWBT's Performance Measurements for reject rates (including all rejects, both mechanized and manual) for the past four months are listed in the table below:¹⁹

MONTH	Jan	Feb	Mar	Apr
REJECT RATE	%	%	%	%
ALL CLECs / EDI	26.3	22.1	24.4	19.9
ALL CLECs / LEX	40.7	40.1	39.1	37.0
ALL CLECs / BOTH	34.3	30.5	31.4	28.1

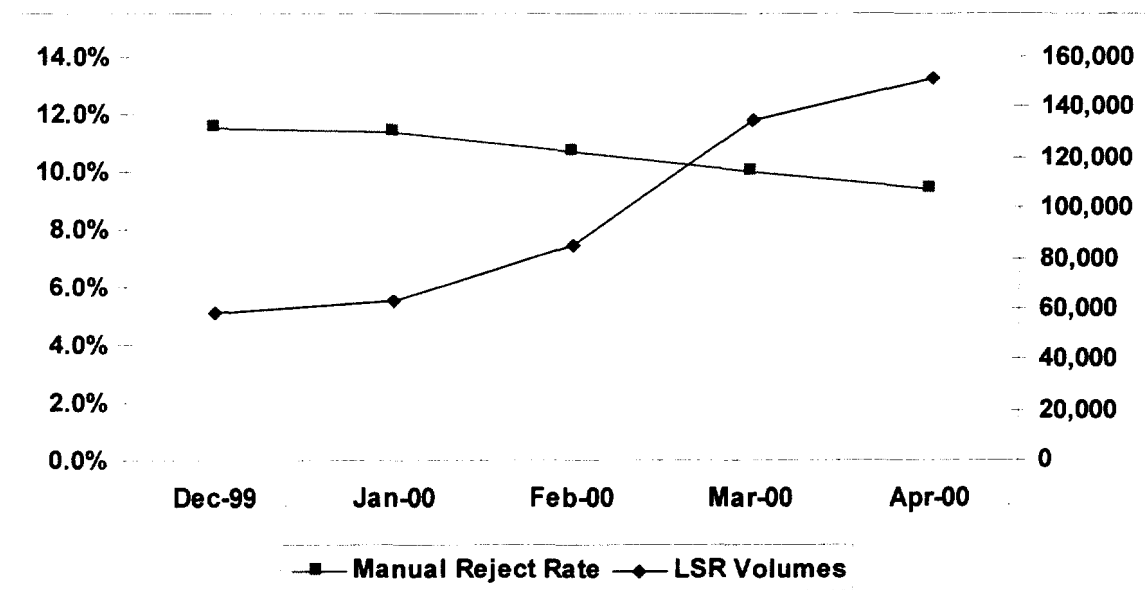
The average reject rate in EDI for the last twelve months was 23.0% and the average reject rate in LEX for the last twelve months was 35.2%; the LEX rate is slightly higher comparable, and the EDI rate is decidedly lower than BA/NY's 27-34% reject rate. New York Order ¶ 175; Order, 15 FCC Rcd at 4044-45, ¶ 175. The overall reject rate in both

¹⁸ See Attachment N, TPUC Workshop Transcript on April 17, pp. 30-31, where this statement is made by Ms. Lawson, a SWBT 271 Compliance SME. The statement was not refuted by MCI WorldCom's attorneys and representatives.

¹⁹ Data source: PM 9, Percent Rejects, which is posted on the CLEC Website.

EDI and LEX for the year 1999 was 29.1%. The average reject rate is less than one out of three, and keep in mind that a given LSR may be rejected multiple times.

60. The overall percentage of manual rejects shown below for both LEX and EDI has steadily decreased from December to April, ranging from 11.5% to 9.4%. These overall manual reject statistics refute arguments that manual rejects increase as commercial volumes increase, as March was the month with the most volume and the lowest percentage of manual rejects. In fact, overall manual reject percentages have declined steadily while volume has increased.



MONTH	Dec	Jan	Feb	Mar	Apr
	%	%	%	%	%
MANUAL REJECT RATE	11.5	11.4	10.7	10.0	9.4
LSR VOLUMES	58,408	62,712	85,488	134,999	151,549

61. Given that AT&T is the only CLEC expressing real concern regarding SWBT's reject rates in this round of comments, (MCI WorldCom's comments on rejects ~~is~~are a very abbreviated "me too" version of AT&T's comments), it is particularly interesting to note that AT&T's EDI reject rate in April was ***

62. AT&T complains that reject rates are decreasing because SWBT changed its process and now sends what were formerly considered rejects as jeopardies. In January, at the explicit request of CLECs, SWBT discontinued its process of rejecting a LSR after a FOC had been sent to the CLEC. Now, if an error is detected after a FOC has been sent, SWBT sends a jeopardy notice. After review of this issue in connection with SWBT's Texas 271 application, the Texas PUC concluded that the effect of the process change on overall reject rates is minimal. *See*: TPUC Supp. Evaluation at 9. For further information concerning this issue, refer to the supplemental reply affidavit of Brian Noland.
63. Even though the process change had a minimal impact on overall jeopardy and reject rates (AT&T's own jeopardy rate for April was only *** ***), and was made at the CLECs' request, AT&T in particular has argued that SWBT has not done enough to prevent these jeopardies from occurring by moving edits from SORD up to ~~LASR/MOG~~LASR/MOG, Chambers/DeYoung Supp. Decl. ¶ 104, ¶ 104, and recently

asked the TPUC to establish an implementation schedule to introduce enhanced SWBT up-front edit capability.

64. In response, SWBT notes first that it has moved a substantial number of SORD edits “up front” to LASR and MOG. As evidenced by AT&T’s Attachment 14, p. 3 (TPUC Open Meeting Transcript, dated December 21, 1998), 56 SORD edits were moved to LASR in January 1999. Additionally, as discussed previously, over 90 SORD edits were moved up to LASR/MOG in a single EDI/LASR release that occurred in October 1999. Ham Reply Aff. ¶ 104. Thus, at least 146 SORD edits were moved to LASR in 1999. As noted in my earlier affidavit, this up front edit capability was created at the express request of the CLECs in order to reduce SWBT’s manual LSR processes. Ham Supp. Aff. ¶¶ 48-49.
65. It is these same edits that are producing the reject rate of which AT&T complains. Yet, rather than focusing on reduction of its own error submissions, AT&T argues that the reject rate is too high, while at the same time arguing that more SORD edits should be moved up to LASR and MOG. As SWBT has noted at various times throughout the TPUC collaborative process, it is more than willing to work with the CLECs to move additional edits up front on as timely a basis as possible through the Change Management Process.
66. In this regard, in response to AT&T’s specific request (*see* AT&T’s Attachment 14), SWBT provided AT&T with the comprehensive list of SORD edits for various reasons, including investigation of its fallout.²⁰ AT&T made it clear that it wanted to understand

²⁰See Attachment O, TPUC Open Meeting 12-21-98, p. 2658. Speaker: Ms. Dalton, former AT&T OSS affiant, “One of the things that we’ve been asking for is a comprehensive list of all the edits that are applied via SORD, which will also help to demonstrate and to figure out where you might have fallout versus where you might not and what you can do to prevent that.”

the percentage of fallout by error type²¹ so that it could “work through the change management process to – with Southwestern Bell to figure out which ones get moved up when” and “perhaps build some things on our end.”²²

67. Since the implementation of LASR GUI in July 1999, AT&T has the capability of tracking its own manual errors (returned electronically with an “MR” error code). Therefore, AT&T has the ability to understand the percentage of fallout by error code for manual errors as well as for mechanical errors (returned by “up front” edits). Yet, despite the SORD edit list and the tracking capabilities made available by LASR GUI, AT&T has not once in the last year proposed in CMP that a particular SORD edit be moved up to LASR, nor has AT&T sent a CLEC Change Request to its Account Manager requesting that a specific SORD edit be moved “up-front.” Rather than pursuing its request in the CMP – a forum established for just that purpose – AT&T has chosen to pursue this issue in the regulatory arena both here and at the Texas Commission. The TPUC, having thoroughly evaluated this issue both from a SORD edit standpoint and from a change management standpoint, has noted that the appropriate place to deal with this issue is in change management.²³
68. AT&T argues that SWBT’s assertion that many types of rejections “can be reduced by CLECs using EDI ordering by pre-programming edits into their side of the interface” only works “in theory.” Chambers/DeYoung Supp. Decl. ¶ 95. Yet, AT&T echoed the

²¹ See Attachment O, TPUC Open Meeting 12-21-98, p. 2667.

²² See Attachment O, TPUC Open Meeting 12-21-98, p. 2671, speaker, Ms. Dalton of AT&T.

²³ See Attachment N, TPUC Workshop Transcript 4-17-00, p. 175. Ms. Nelson of TPUC Staff speaking: (about implementing a Performance Measure for moving SORD edits to LASR) “...Southwestern Bell has to have an obligation to do something within a certain time frame, or we have to decide that there’s an obligation, and those moving of SORD edits up to LASR are something that’s being done in change management, and it seems to me at least inappropriate to decide in this process, as part of performance measures, that we’re going to require certain changes be moved up to LASR and measure it that way until there’s²-- because there’s a process in place already, being change management, to make those decisions.”

same sentiment as recently as April 17, 2000, at the TPUC workshop. AT&T stated that one of the benefits of up front edits was not only to receive rejects ~~more timely, in a more~~ timely fashion, which enables a CLEC to correct the LSR in a more expeditious manner, but also to gain “more insight into how to build those types of edits into your system to try to prevent those edits from occurring.”²⁴ Despite AT&T’s complaints that SWBT has not provided AT&T with adequate documentation or sufficient information to improve its reject rates (Id.), since implementation of LASR GUI, a CLEC can track its rejects and create its own ~~trending~~ trending data to improve its reject rates. The TPUC Staff agrees with SWBT’s assessment and has concluded that AT&T has enough information to investigate and improve its own reject rates.²⁵ See Attachment N, TPUC Workshop Transcript, p. 177-178.

69. AT&T argues that the time it takes AT&T to resubmit a rejected LSR ~~as is~~ “irrelevant to the adequacy of SWBT’s performance.” Chambers/DeYoung Supp. Aff. ¶ 98, footnote 44
69. n.44; and Ham Supp. Aff. ¶¶ 38-40, Attachment M. SWBT never stated or implied that the CLEC return rate in any way affected SWBT’s performance. However, when AT&T argues the need for more up-front edits, precisely because LASR edits are received in a more timely fashion (See, Dalton/DeYoung Decl. ¶¶ 117-120) or because of the “lag” time associated with receiving manual rejects (Id. ¶ 137), AT&T can only expect that SWBT will provide evidence that – despite the capabilities it has today – AT&T is notably deficient when it comes to resubmission of rejected LSRs. Similarly, when AT&T clamors for additional up-front edits so they can correct their errors in a “more

²⁴ Speaker: Ms. Chambers, AT&T affiant. See Attachment N, TPUC April 17, 2000 Workshop Transcript at 147-8.

expeditious manner” (see, Ms. Chambers’ statement, Attachment N, p. 148,) it is only fair for SWBT to argue that AT&T fails to correct the rejects it currently receives in a timely manner.

70. Specifically, AT&T’s ~~redacted comment asserts~~unredacted comments assert ***

*** Ham Supp. Aff., Attachment M. Even assuming manually rejected LSRs took 7 hours longer to reach the CLEC (the difference between the average mechanical and manual reject times in February), AT&T *still* took *** to resubmit a LSR rejected by an up-front edit. And this scenario assumes that *all* of AT&T’s LSRs were rejected manually when in reality, only *** of AT&T’s rejects in February were manual rejects.

71. AT&T’s comments criticize SWBT’s referral to EDI reject rates to the exclusion of LEX reject rates in previous comments. Chambers/DeYoung Supp. Decl. ¶ 89. In two of my previous affidavits an attachment showing LEX reject rates has been included as well as the current LEX reject rates updated with March and April data (~~see~~, Attachment D). ~~See also~~, Ham Reply Aff., Attachment Attach. H and Ham Supp. Aff., Attachment Attach K. Whether LSRs are submitted via EDI or LEX, rejects are a function of LASR, MOG and

²⁵ Ms. Nelson, TPUC Staff speaking: “...I understand that’s because in certain cases Southwestern Bell has the information, but in other cases like rejects, the CLECs also have information on what the cause of their reject was.”

SORD. The same edits are used to validate the accuracy of a LSR regardless of its origination.

72. In its New York Order, the FCC found that a wide variation in individual rejection rates strongly implies that the care a CLEC takes in submitting its orders makes a significant difference in its reject rates. New York Order ¶ 175-Order, 15 FCC Rcd at 4044-45, ¶ 175. In April, of those CLECs submitting over 500 LSRs via SWBT's EDI, reject rates range from 10.8% to 66.8%. Also in April, of those CLECs submitting over 300 LSRs via LEX, reject rates range from 16.0% to 64.9%. Individual CLEC reject rates are provided as Attachment D to my affidavit. As in Bell Atlantic's case, SWBT can show that many carriers placing the highest volume of orders have been able to achieve reject rates well below the average rate. Id., footnote 555-Id. at 4045, ¶ 175, n.555. In fact, CLEC I's reject rate for EDI in April is 10.8% and CLEC OO's reject rate for LEX in April is 16%. SWBT's point is this: if one CLEC can attain these results in one month, any CLEC can attain similar results in any month – SWBT's systems' rejections and documentation do not change from month to month (with the exception of implementation of a new release). Therefore, the only variable is the CLEC's own LSR submissions. When a CLEC consistently submits accurate and complete LSRs, its rejection rates will decrease.
73. AT&T attempts to attribute rejections to SWBT's incorrect rejections of valid CLEC orders. Chambers/DeYoung Supp. Decl. ¶ 92. In an effort to demonstrate SWBT's "erroneous" rejections for invalid due date, AT&T cites an incident that occurred in July 1999, which was described in detail in my reply affidavit. However, SWBT has already shown that the rejections were not at all erroneous. In fact, the rejections were valid

because the manner in which AT&T sent its EDI files caused SWBT's EDI system to queue, which resulted in some files being processed after midnight – thus AT&T's desired due date was no longer the current date. This incident was immediately and permanently resolved and was thoroughly investigated by the TPUC Staff. Ham Reply Aff. ¶¶ 97-102.

74. This is the same sort of argument that AT&T offered (unsuccessfully) in Bell Atlantic's application. In the Bell Atlantic proceeding AT&T attempted to assert that Bell Atlantic issued spurious rejection notices. *See, New York Order ¶ 175, footnote 556; Order, 15 FCC Rcd at 4045, ¶ 175, n.556.* In the Bell Atlantic proceeding, the FCC found that because AT&T provided no evidence as support for their claim, the FCC was unable to find, based upon AT&T's claims that Bell Atlantic failed to comply with the requirements for nondiscriminatory access. *Id.*
75. Telcordia found the high reject rate in the Functional Test was caused, at least in part, by CLECs that had submitted up to *thirteen* versions of an LSR before providing an accurate and complete LSR. Ham Aff. ¶ 178; Reply Aff. ¶ 88. SWBT has shown that if a CLEC programs basic edits on its side of the interface (for example, it must submit a current or future date as its desired due date) a CLEC can reduce the quantity of its rejections. Ham Supp. Aff. ¶¶ 41-43. Finally, SWBT has demonstrated that CLECs are capable of submitting volumes of LSRs at relatively low reject rates. Ham Reply Aff., Attachment H, Ham Supp. Aff., Attachment K, and this attachment has been updated with March and April data in Attachment D to this supplemental reply affidavit.
76. AT&T continues to insist it wants more ~~up-front~~up-front edits for various reasons. *First*, AT&T wants to track its own errors to learn why its LSRs are rejected; while continuing

to claim SWBT does not provide sufficient information to track errors (even though the TPUC discounts AT&T's claim). *Second*, AT&T wants to obtain the list of SORD edits to help SWBT set priorities in CMP as to which edits should be moved up front; although AT&T has had access to the list for over a year and has not submitted one CLEC Change Request to move a SORD edit to LASR. *Third*, AT&T wants edits moved to LASR so it can receive rejects more timely, correct its LSRs and resubmit more quickly; yet AT&T in its "improved" time for February *still* took an average of *** to resubmit its rejected LSRs. *Fourth*, AT&T wants edits moved up-front so that it can pre-program its side of the EDI ordering interface to reduce rejects; yet it fails to offer evidence that it has undertaken any effort to do so until now.

77. Furthermore, moving edits up-front—while a win/win situation for SWBT & CLECs, (SWBT wins because it will eliminate manual intervention; CLECs win by eliminating ~~78.~~ manual intervention and receiving rejects more quickly) is no guarantee that overall reject rates will decrease. This will only occur when CLECs begin submitting accurate and complete LSRs.
78. In conclusion, SWBT has presented evidence that it has implemented substantial up-front editing capabilities at the express request of the CLECs. Those editing capabilities result in less manual handling of LSRs by SWBT, and – together with LASR GUI – provide CLECs with the ability to monitor and trend errors, train service representatives in accurate LSR submission and develop their own editing capabilities. SWBT further has demonstrated that any CLEC is capable of and can substantially reduce its reject percentages based on the care it takes in order submission. SWBT's reject rates and up